

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

MONTEREY RESEARCH, LLC,

Plaintiff and Counter-Defendant,

v.

RENESAS ELECTRONICS CORPORATION,

Defendant and Counter-Plaintiff,

DENSO CORPORATION & DENSO  
INTERNATIONAL AMERICA, INC.

Defendants.

Case No. 2:24-cv-00238-JRG

**JURY TRIAL DEMANDED**

**DECLARATION OF REGAN J. RUNDIO IN SUPPORT OF  
DEFENDANTS' MOTION TO SEVER AND STAY  
PENDING RESOLUTION OF MANUFACTURER'S CASE**

I, Regan J. Rundio, hereby declare as follows:

1. I am an associate at the law firm of Morrison & Foerster LLP, counsel of record in this action for Renesas Electronics Corporation ("REL"). I am a member in good standing of the Bar of the State of Texas. I make this declaration on my own personal knowledge of the facts set forth in this Declaration and, if called as a witness, I could and would competently testify to them.

2. Attached as **Exhibit 1** is a true and correct copy of an April 24, 2019, letter from Richard Misiag, VP of Licensing for IPVALUE Management Inc., the Authorized Agent for Monterey Research, LLC, directed to Bunsei Kure, then-President and CEO of REL and other REL employees.

3. Attached as **Exhibit 2** is a true and correct copy of a September 13, 2024 declaration of Toyohiro Shimogawa, a Senior Principal Engineer at REL.

4. Attached as **Exhibit 3** is a true and correct copy of a September 13, 2024 declaration of Ken Matsubara, a Senior Manager at REL.

5. Attached as **Exhibit 4** is a true and correct copy of a September 13, 2024 declaration of Takeshi Samejima, a Senior Staff Digital Engineer at REL.

6. Attached as **Exhibit 5** is a true and correct copy of Monterey Research, LLC's September 6, 2024 Disclosure of Asserted Claims and Infringement Contentions.

7. Attached as **Exhibit 6** is a true and correct copy of a slip opinion in *Network System Technologies, LLC v. Texas Instruments Inc.*, No. 2:22-cv-00482-RWS, ECF No. 96 (E.D. Tex. Sept. 26, 2023).

8. Attached as **Exhibit 7** is a true and correct copy of a September 13, 2024 declaration of Takahiro Goto of Semiconductor-Originated Key Technologies R&D Division at DENSO Corporation.

9. Attached as **Exhibit 8** is a true and correct copy of a September 7, 2024, stipulation from DENSO Corporation and DENSO International America, Inc.

10. Attached as **Exhibit 9** is a true and correct copy of the Stipulation of OnePlus Technology (Shenzhen) Co., Ltd., from *Network Sys. Techs., LLC v. Samsung Elecs. Co., Ltd.*, No. 2:22-cv-481, ECF No. 78-1 (E.D. Tex. Oct. 11, 2023).

I declare under penalty of perjury under that the above statements are true and correct.

Executed on this 19th day September 2024, in Austin, Texas.

/s/ Regan J. Rundio  
Regan J. Rundio

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that counsel of record who are deemed to have consented to electronic services are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3) on September 19, 2024.

/s/ Timothy Saulsbury  
Timothy Saulsbury